

## REMARKS

Claims 1-11 were present in the application prior to this response. No claims have been amended or cancelled. Reconsideration of the rejections pertaining to all pending claims is requested.

### **I. Priority Objection**

The Office Action states that the Applicant must add a line stating that the present application is a divisional application. The Applicant has amended the application accordingly.

The Applicant notes that the transmittal form used to file the present application included an amendment to add the priority information. The Applicant requests that the Office check to see if the amendment pertaining to priority has already been entered.

### **II. Rejection of claims 1-11 under 35 U.S.C. §103(a)**

Claims 1-11 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Todd (U.S. 6,463,418).

#### Applicant's Invention of Claim 1

Claim 1 is independent and is directed toward:

1. A method of facilitating the transfer of data to authorized users over the Internet, the method comprising:
  - (i) running a web server process on at least one host machine;
  - (ii) running an ftp server process on a separate host machine;
  - (iii) establishing a secure communication link between the host machines;

- (iv) establishing at least one hard link between storeroom file storage areas and customer account file storage areas, the at least one hard link comprising a pointer to a file; and
- (v) dynamically allocating customer access information from a secured database.

The Office Action states that Todd discloses all the elements of claim 1 except for the hard link. The Office Action further states that the hard link would have been obvious to one having ordinary skill in the art.

The Applicant asserts that the "hard link" recited in claim 1 is not necessarily a hard communication link between the storeroom file storage areas and the customer account file storage areas. Rather, the hard link comprises a "pointer to a file." Accordingly, the hard link is more than a simple communication medium. No such hard link is disclosed or even suggested in Todd. For example column 5, lines 55-58, which were cited in the Office Action state:

Some or all of connections 114, 116, 124, 126, 136, 155, 164, 166, 168 may be internet connections or other types of connections such as "direct" phone line connections or FDDI or Ethernet connections.

All of the examples of the connections refer to simple data connections between components. None of these suggested connections refer in any way to "at least one hard link comprising a pointer to a file." Thus, the connections disclosed in Todd only refer to physical connections and not to hard links as recited in claim 1.

The Office Action states that Todd provides motivation by indicating that many variations, modifications, additions and improvements are available at column 13, lines 35-57. This portion of Todd is simply a catchall phrase and provides no motivation to use a hard link as recited in claim 1. Furthermore, any improvement or the like suggested by Todd refers to improvements to the physical connections and not to a "hard link between storeroom file storage areas and customer account file

storage areas, the at least one hard link comprising a pointer to a file" as recited in claim 1.

Accordingly, Todd cannot render claim 1 obvious.

The Applicant respectfully requests reconsideration of the rejection.

#### CLAIMS 2-11

Claims 2-11 are dependent on claim 1 and are therefore allowable by way of their dependence and for other reasons.

The Applicant requests reconsideration of the rejection.

Based on the foregoing, the Applicant contends that the claims are in condition for allowance.

Respectfully submitted,

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